

AB:EL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

-----X

UNITED STATES OF AMERICA

– against –

JESSICA BESS JASON-GUETA,

Defendant.

COMPLAINT
(T. 31, U.S.C., § 5332)

Case No. 24-MJ-009

-----X

EASTERN DISTRICT OF NEW YORK, SS:

RYAN SAMAROO, being duly sworn, deposes and states that he is a Special Agent with the United States Department of Homeland Security, Homeland Security Investigations (“HSI”), duly appointed according to law and acting as such.

On or about January 2, 2024, within the Eastern District of New York and elsewhere, the defendant JESSICA BESS JASON-GUETA did knowingly and with the intent to evade the currency reporting requirements under Title 31, United States Code, Sections 5316(a)(1)(B) and 5316(b), conceal more than \$10,000 in currency, to wit, approximately \$87,598 in United States currency, on the person and in articles of luggage and other containers, and transport and transfer and attempt to transport and transfer such currency from a place outside of the United States to a place within the United States.

(Title 31, United States Code, Section 5332)

The source of your deponent's information and the grounds for his belief are as follows:¹

1. I have been a Special Agent with HSI for approximately 5 years. I am familiar with the facts contained in this affidavit as a result of my participation in the investigation, which includes, but is not limited to, my review of the physical evidence, my review of the file and conversations with other law enforcement personnel assisting with the investigation.

2. On or about January 2, 2024, the defendant JESSICA BESS JASON-GUETA, a citizen of the United States, arrived at John F. Kennedy International Airport in Queens, New York onboard Delta flight DL 1886, arriving from St. Maarten. The defendant was traveling with one carry-on handbag bag (the "Handbag") and one carry-on luggage (the "Luggage").

3. As JASON-GUETA proceeded through Customs & Border Protection ("CBP") primary inspection, a CBP officer observed that JASON-GUETA was attempting to conceal currency in her Handbag. The CBP officer referred JASON-GUETA for a secondary inspection.

4. Prior to the secondary inspection of JASON-GUETA's Luggage, JASON-GUETA confirmed to CBP officers that the Luggage and its contents belonged to her. JASON-GUETA verbally stated that she was traveling with approximately \$5,000 in United States currency. JASON-GUETA was subsequently provided CBP Form 6059B, where she reported that she was not transporting in excess of \$10,000 of United States

¹ Because the purpose of this affidavit is to set forth only those facts necessary to establish probable cause, I have not set forth all the facts and circumstances of which I am aware.

currency or monetary instruments. CBP officers requested that JASON-GUETA further indicate the amount of currency in her possession on the back of the Form 6059B. JASON-GUETA wrote down \$5,000 and signed next to the amount.

5. CBP officers searched the Luggage and discovered several bundles of United States currency, totaling \$15,005.

6. CBP officers further conducted a search of JASON-GUETA's person, whereby they discovered additional bundles of currency concealed in, among other places, JASON-GUETA's bra and the inside of her pants. Following the search, JASON-GUETA retrieved, and provided to the CBP officers, a blue plastic bag from her Handbag, which contained three additional bundles of United States currency. In total, CBP officers discovered \$87,598 in United States currency in JASON-GUETA's Handbag, Luggage, and on her person.

7. During the search, JASON-GUETA stated to CBP officers that she believed that if she declared more than \$10,000 in United States currency, that her money would be taken from her by CBP.

8. WHEREFORE, your deponent respectfully requests that the defendant JESSICA BESS JASON-GUETA be dealt with according to law.



RYAN SAMAROO
Special Agent
Homeland Security Investigations

Sworn to before me by telephone this
3 day of January, 2024



L
GE